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Delineating Western Direct Assigned Facilities and Network Facilities

Western uses FERC guidelines and Orders to determine if a Western facility is a Direct Assigned Facility (DAF) or a Network facility that provides support to all transmission users.

FERC has an established bright line test to functionally identify DAFs. Generally, DAFs interconnect load and generation to the integrated transmission network (Network). Network facilities serve all transmission users. Other FERC orders set forth the criteria for separating the DAF from the Network. FERC Order 2003 states that DAFs are those facilities behind the point of interconnection of the Network transmission system. Network upgrades are those additions or modifications required at or beyond the point of interconnection on the Network. This is the bright line test that separates the DAFs from the Network upgrade beyond the point of interconnection.

Most of the Western CVP generation tie-lines that interconnect the CVP power plants to the CVP Network are DAF or non-transmission facilities. The exception to this will be the transmission circuits from the Shasta Substation once the double breaker-double bus project is completed. Radial transmission lines serving load are also generally considered to be a DAF or non-transmission facility.

FERC has also promulgated a seven factor test for the purpose of distinguishing distribution facilities from Network facilities.
The seven factor test is used to separate distribution from transmission facilities.

FERC Seven Factor Test is comprised of the following:
1. Local distribution facilities are normally in close proximity to retail customers.
2. Local distribution facilities are primarily radial in character.
3. Power flows into local distribution systems; it rarely, if ever, flows out.
4. When power enters a local distribution system, it is not reconsigned or transported on to some other market.

5. Power entering a local distribution system is consumed in a comparatively restricted geographical area.
6. Meters are based at the transmission/local distribution interface to measure flows into the local distribution system.
7. Local distribution systems will be of reduced voltage.